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6 Attorneys for Plaintiff
MARKEL INSURANCE COMPANY
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 MARKEL INSURANCE COMPANY,
12 Plaintiff,
13

14 v.

15 ROBERT C. GRAHAM, LTD. dba LAWYERS
16 WEST dba ROBERT GRAHAM &
ASSOCIATES; ROBERT C. GRAHAM, an
individual; DELWYN WEBBER, an individual;
MICHELE CHAMBERS, an individual;
17 OLESYA SIDORKINA, an individual,
LINDA MARIE GRAHAM, an individual,
18

Defendants.

Case No.: 2:17-cv-00975-RFB-GWF

**STIPULATION FOR DISMISSAL OF LINDA
GRAHAM WITHOUT PREJUDICE**

19 IT IS HEREBY STIPULATED by and between Plaintiff Markel Insurance Company ("Markel")
20 and Defendant Linda Graham (collectively the "Parties") that the Complaint be dismissed without
21 prejudice as to Defendant Linda Graham as follows:

22 **STIPULATION**

- 23 A. Markel has filed a complaint for declaratory judgment in this Court, seeking a judicial
24 determination of its relative rights and responsibilities with respect to insurance coverage provided
25 to the Defendants, including Defendant Linda Graham.
- 26 B. Defendant Linda Graham was an attorney in the offices of Defendant Robert Graham, and may
27 potentially stand as an additional insured under the policy dependent upon the outcome of this
28 litigation.

- 1 C. Defendant Linda Graham does not wish to participate in this declaratory judgment action, and
2 does not take a position as to whether she would be entitled to any defense or indemnity benefits
3 or proceeds of the policy at some future date.
- 4 D. In consideration of Linda Graham's agreement not to challenge the position taken by Markel in
5 this litigation, nor to otherwise seek either now or in the future to invoke benefits under the
6 Markel policy at issue, the parties stipulate that the complaint as to Defendant Linda Graham will
7 be dismissed, without prejudice.
- 8 E. Defendant Linda Graham filed an Answer to the First Amended Complaint for Rescission and
9 Declaratory Relief on October 6, 2017.
- 10 F. Pursuant to this stipulation, all parties will bear their own attorneys' fees and costs. A voluntary
11 dismissal of the complaint allegations as to Defendant Linda Graham only will be filed upon
12 approval of this stipulation.

13 DATED this 22 day of December 2017.

14 CLARK HILL PLLC

15 By 

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LINDA GRAHAM

By: 

LINDA GRAHAM
8010 S. County Road 5, #207
Fort Collins, Colorado 80529
In proper person

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge

DATED this 21st day of December, 2017.

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